

Message

From: Keller, Lynn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=08038B86D66A47D3AACA8BEE1A63A5A7-LKELLER]
Sent: 12/5/2015 3:49:01 AM
To: Fennessy, Christopher [christopher.fennessy@Rocket.com]
Subject: RE: [EXTERNAL] Accepted: Island OU SLERA Responses to Agency Comments and Area 40 EPA/State Agreement

Hi, Chris. Unfortunately Ned is sick—he told me Weds he'd likely not be able to work Thursday. He said he would try to look it over and get back to me today with any additional comments, but I haven't received anything today either so he must still be sick. If he has more to add on Monday I'll send it over to you.

To elaborate more on the issues with the SLERA that both Ned and CH2MHill agree on, it centers on the Response to Comments 1(a) and 1(b) that I forwarded. Some of the SLERA assumptions made are what should be reserved for the BERA. Gray areas in the SLERA should move forward to the BERA for further analysis if an immediate yes or no answer can't be obtained. The process used for writing off different criteria is not clear—alternative logic and factors need to be explained and listed out, including calculations. From what I understand, although the White Paper outlined the hierarchy of toxicological criteria, it was geared more to the BERA, not the SLERA. So more justification is needed in order to adopt alternative bioaccumulation factors; otherwise the "maybes" cannot be dismissed and need to be carried through to the BERA.

Have a good weekend,
Lynn

Lynn M. Keller, EI, PMP
US EPA Region 9 RPM
75 Hawthorne St, SFD 7-1
San Francisco, CA 94105
415.947.4162

From: Fennessy, Christopher [mailto:christopher.fennessy@Rocket.com]
Sent: Thursday, December 03, 2015 8:05 AM
To: Keller, Lynn <Keller.Lynn@epa.gov>
Subject: RE: [EXTERNAL] Accepted: Island OU SLERA Responses to Agency Comments and Area 40 EPA/State Agreement

Hi Lynn – Any additional feedback from Ned? Thanks, Chris

Christopher M. Fennessy, P.E.
Aerojet Rocketdyne, Inc.
Engineering Manager, Site Remediation
11260 Pyrites Way, Suite 125
Rancho Cordova, CA 95670
Ph: 916-355-3341
Fax: 916-355-6145
Email: Christopher.Fennessy@Rocket.com

From: Keller, Lynn [mailto:Keller.Lynn@epa.gov]
Sent: Wednesday, December 02, 2015 6:09 AM
To: Fennessy, Christopher
Subject: [EXTERNAL] RE: [EXTERNAL] Accepted: Island OU SLERA Responses to Agency Comments and Area 40 EPA/State Agreement

Hi, Chris.

I just pinged Ned on this; he wanted the chance to look through all of the comments in more detail and send me an email to forward to you. I'll check in tonight and tomorrow morning to see if he's sent anything more. The main outstanding concern is comments 1(a) and 1(b); Ned agrees these are still problematic and that the White Paper criteria needs to be adhered to in the SLERA, along with including additional calculations and lines of evidence for selecting/dismissing data prior to the BERA.

Thanks,
Lynn

Lynn M. Keller, EI, PMP
US EPA Region 9 RPM
75 Hawthorne St, SFD 7-1
San Francisco, CA 94105
415.947.4162

From: Fennessy, Christopher [<mailto:christopher.fennessy@Rocket.com>]
Sent: Tuesday, December 01, 2015 10:50 AM
To: Keller, Lynn <Keller.Lynn@epa.gov>
Subject: RE: [EXTERNAL] Accepted: Island OU SLERA Responses to Agency Comments and Area 40 EPA/State Agreement

Hi Lynn – Any feedback from Ned? We would like to be able to come to the meeting prepared to discuss the issue. Thanks, Chris

Christopher M. Fennessy, P.E.
Aerojet Rocketdyne, Inc.
Engineering Manager, Site Remediation
11260 Pyrites Way, Suite 125
Rancho Cordova, CA 95670
Ph: 916-355-3341
Fax: 916-355-6145
Email: Christopher.Fennessy@Rocket.com

From: Fennessy, Christopher
Sent: Wednesday, November 25, 2015 9:33 AM
To: 'Keller, Lynn'
Subject: RE: [EXTERNAL] Accepted: Island OU SLERA Responses to Agency Comments and Area 40 EPA/State Agreement

Great. Thanks! Have a great Thanksgiving and enjoy the time off!!

Christopher M. Fennessy, P.E.
Aerojet Rocketdyne, Inc.
Engineering Manager, Site Remediation
11260 Pyrites Way, Suite 125
Rancho Cordova, CA 95670
Ph: 916-355-3341
Fax: 916-355-6145
Email: Christopher.Fennessy@Rocket.com

From: Keller, Lynn [<mailto:Keller.Lynn@epa.gov>]

Sent: Tuesday, November 24, 2015 4:02 PM

To: Fennessy, Christopher

Subject: [EXTERNAL] RE: [EXTERNAL] Accepted: Island OU SLERA Responses to Agency Comments and Area 40 EPA/State Agreement

Hi, Chris.

Yes—Area 40 in the morning and IOU SLERA in the afternoon. I had a call with Ned Black and CH2MHill yesterday also regarding the outstanding SLERA issues; Ned is going to shoot me an email with his take on the deficiencies and I'll get that over to you ASAP.

Have a happy Thanksgiving!

Lynn

Lynn M. Keller, EI, PMP
US EPA Region 9 RPM
75 Hawthorne St, SFD 7-1
San Francisco, CA 94105
415.947.4162

From: Fennessy, Christopher [<mailto:christopher.fennessy@Rocket.com>]

Sent: Saturday, November 21, 2015 12:33 PM

To: Keller, Lynn <Keller.Lynn@epa.gov>

Subject: RE: [EXTERNAL] Accepted: Island OU SLERA Responses to Agency Comments and Area 40 EPA/State Agreement

Assume we are ok with Area 40 in morning.

-----Original Message-----

From: Keller, Lynn [Keller.Lynn@epa.gov]

Sent: Friday, November 20, 2015 12:36 PM Pacific Standard Time

To: Fennessy, Christopher

Subject: [EXTERNAL] Accepted: Island OU SLERA Responses to Agency Comments and Area 40 EPA/State Agreement

Hi, Chris. You already know this – but just to reiterate that we'll need to swap morning and afternoon times for Area 40 and the IOU SLERA.

Thanks for all of the time and explanation on site this week!

Lynn

Lynn M. Keller, EI, PMP
US EPA Region 9 RPM
75 Hawthorne St, SFD 7-1
San Francisco, CA 94105
415.947.4162